

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In the matter of: :

NIU Holdings LLC, :

Reorganized Debtor. :

**Chapter 11**

**Case No. 15-10155 (SCC)**

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NIU Holdings LLC, :

Plaintiff, :

v. :

AT&T Mobility Holdings, B.V.; New Cingular  
Wireless Services, Inc.; Nextel International  
(Uruguay) LLC; and Comunicaciones Nextel  
de México S.A. DE C.V., :

Defendants. x

**Adv. Proc. No. 19-01099**

**STIPULATION AND ORDER**

WHEREAS, Plaintiff NIU Holdings LLC ("Plaintiff") commenced the above-captioned Adversary Proceeding by filing the *Adversary Complaint for Declaratory Judgment and Breach of Contract* ("Adversary Complaint") (Adv. D.I. 1) on March 25, 2019 and, with the agreement of counsel, by delivering the Summons and Adversary Complaint to the undersigned counsel for Defendants AT&T Mobility Holdings, B.V.; New Cingular Wireless Services, Inc.; Nextel International (Uruguay) LLC; and Comunicaciones Nextel de México S.A. DE C.V. ("Defendants") on March 26, 2019;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Defendants, through their respective undersigned attorneys, that counsel for Defendants accepts

service of the Summons and Adversary Complaint on behalf of each Defendant; and hereby acknowledges that service was effected on March 26, 2019;

IT IS FURTHER STIPULATED AND AGREED that the time for Defendants to answer, move, or otherwise respond to Plaintiff's Adversary Complaint is hereby extended to sixty (60) days from the date of service, to and through May 25, 2019;


IT IS FURTHER STIPULATED AND AGREED that except with regard to service of the Summons and Adversary Complaint, each Defendant reserves all rights and defenses, including with respect to challenges to the assertion of personal jurisdiction, and entry into this Stipulation shall not impair, expand, or otherwise affect such rights and defenses; and

*[remainder of page intentionally left blank]*

IT IS FURTHER STIPULATED AND AGREED that this Stipulation may be executed by facsimile or other electronic means (e.g. pdf) in lieu of the original and may be signed in counterparts.


Dated: New York, New York  
March 26, 2019

**JONES DAY**

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*Attorneys for Defendants AT&T Mobility Holdings, B.V.; New Cingular Wireless Services, Inc.; Nextel International (Uruguay) LLC; and Comunicaciones Nextel de México S.A. DE C.V.*

IT IS SO ORDERED this \_\_\_\_ day of March 2019.

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Hon. Shelley C. Chapman  
United States Bankruptcy Judge